

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHAQUITHIA LANETTE JACKSON,

Plaintiff,

Case No.

Judge

v.

JURY TRIAL DEMANDED

SHERIFF ALYSHIA M. DYER,
DEPUTY AUSTIN PEARSON,
COL. JAMES F. GRADY II, and
OFFICER TODD POPPEMA
(Official Capacities),
Defendants.

WEBSTER LAW OFFICE, PLLC
Dionne E. Webster-Cox (P68845)
Attorney for Plaintiff
24100 Southfield Road, Suite 100
Southfield, MI 48075
(734) 215-2444 / (734) 943-6069 – Fax
dewc@WebsterLawOfficePLLC.com

BARTON LAW, PLLC
Darnell T. Barton (P83363)
Attorney for Plaintiff
220 W. Congress St
Detroit, MI 48226
Detroit, MI 48226
313-288-8010
Info@BartonLawPLLC.com

COMPLAINT

Plaintiff, Shaquithia Lanette Jackson, by and through her attorneys, Webster Law Office PLLC and Barton Law, PLLC, states the following for her complaint against the above-named Defendants:

INTRODUCTION

This is a civil action arising from violations of Plaintiff Shaquithia Jackson's constitutional rights when she was subjected to excessive force, unlawful arrest, denial of medical care, and illegal search and seizure on June 8, 2022, at 545 Villa Dr., Ypsilanti, Michigan. Plaintiff was not the subject of the arrest warrant but was nevertheless forcibly detained, injured, and held without treatment. Defendants are sued in their official capacities under 42 U.S.C. § 1983 for violations of the Fourth and Fourteenth Amendments.

JURISDICTION AND VENUE

This Court has jurisdiction under 28 U.S.C. §1331 and §1343(a)(3)-(4).

Venue is proper pursuant to 28 U.S.C. §1391 because the events giving rise to this action occurred in Washtenaw County, Michigan.

PARTIES

1. Plaintiff is a resident of Ypsilanti, Michigan.
2. At all relevant times, Defendants were sworn law enforcement officers acting under color of law and within the scope of their employment.

STATEMENT OF FACTS

3. On June 8, 2022, Defendants entered Plaintiff's home to execute an arrest warrant for her son, not Plaintiff.

4. Plaintiff was violently handcuffed causing serious wrist injuries including nerve and soft tissue damage.
5. Plaintiff repeatedly requested medical care but was denied treatment for three days while held in maximum security.
6. Medical imaging confirmed permanent injuries and disfigurement to her wrists.
7. Charges of resisting and obstructing were later dismissed against Plaintiff.
8. Plaintiff's property including cash, jewelry, and personal items was taken without full accounting or return.

FIRST CAUSE OF ACTION

42 U.S.C. §1983 – Fourth and Fourteenth Amendment Violations

9. Plaintiff re-alleges and incorporates all prior paragraphs.
10. Defendants violated Plaintiff's clearly established constitutional rights, including:
 - a. The right to be free from excessive force
 - b. - The right to be free from unlawful arrest and seizure
 - c. The right to necessary medical treatment while in custody
11. All in violation of the Fourth and Fourteenth Amendments of the U.S. Constitution.

12. As a direct and proximate result, Plaintiff suffered physical and emotional injury.

13. Plaintiff seeks compensatory and punitive damages pursuant to 42 U.S.C. §1983 and attorneys' fees under 42 U.S.C. §1988.

14. On or about January 24, 2025 all defendants were sent an Intent to Sue Letter. (Exhibit 1 – Intent to Sue Letter)

WHEREFORE, Plaintiff Shaquithia Lanette Jackson seeks judgment against Defendants in the amount of \$2,000,000.00 for compensatory and punitive damages, plus attorney's fees and costs, and all other relief the Court deems just.

Dated: April 21, 2025	Respectfully submitted, <u>/s/ Dionne E. Webster-Cox</u> Dionne E. Webster-Cox (P68845) Webster Law Office, PLLC 24100 Southfield Road, Suite 100 Southfield, MI 48075 dewc@WebsterLawOfficePLLC.com
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I, Shaquithia Lanette Jackson, certify that the contents of this complaint are true to the best of my knowledge and belief.

Shaquithia Jackson

Shaquithia Lanette Jackson

Exhibit 1 - Intent to Sue Letter

Webster Law Office PLLC
24100 Southfield Road – Suite 100
Southfield, MI 48075

734-215-2444 office

734-943-6069 fax

January 24, 2025

Sheriff Alyshia M. Dyer
Washtenaw County Sheriff
2201 Hogback Road
Ann Arbor, MI 48105

Col. James F. Grady II
Michigan State Police Dept.
7119 N. Canal Road
Lansing, MI 48913

Deputy Austin Pearson
Washtenaw County Sheriff
2201 Hogback Road
Ann Arbor, MI 48105

Officer Todd Poppema
Michigan State Police Dept.
3050 W. Grand Blvd., Suite 1-700
Detroit, MI 48202

RE: Shaquithia Lanette Jackson
Date of Incident – June 8, 2022
Excessive Force
Denial of Medical Attention

NOTICE OF INTENT TO SUE

To Whom It May Concern:

This letter serves as formal notice of my client's intent to file a civil action under 42 U.S.C. § 1983 for violations of her Fourth Amendment rights arising from the events that occurred on June 8, 2022, involving excessive use of force and denial of medical attention.

On the above-referenced date, officers, including but not limited to Deputy Austin Pearson of the Washtenaw County Sheriff's Office and/or Officer Todd Poppema of the Michigan State Police, arrived at 545 Villa Dr., Ypsilanti, Michigan, to execute an arrest warrant for Dymarion Sharquere Jackson. During the course of this operation, my client, Ms. Shaquithia Lanette Jackson, was taken into custody.

While being arrested, Ms. Jackson was subjected to excessive force. Specifically, the handcuffs placed on her wrists were excessively tight, causing significant pain, injury, and permanent disfigurement. Despite her repeated complaints about the tightness and the visible physical effects of the handcuffs, the officers failed to adjust them or provide relief. Furthermore, Ms. Jackson was incarcerated at the Washtenaw County Jail, where she was denied medical attention for three days, exacerbating her injuries and suffering.

Ms. Jackson was subsequently charged with resisting and obstructing; however, these charges were later dropped. Despite the dismissal of charges, Ms. Jackson continues to endure the physical and emotional scars from this incident, including permanent marks on her wrists from the handcuffs and the trauma of being denied necessary medical care. The actions of the officers and the subsequent denial of medical care constitute violations of Ms. Jackson's constitutional rights under the Fourth Amendment, which protects against unreasonable searches and seizures, including the use of excessive force. Additionally, the denial of medical attention constitutes cruel and unusual punishment in violation of the Eighth and Fourteenth Amendments.

In light of these violations, we intend to pursue legal action seeking compensatory and punitive damages for the harm caused to Ms. Jackson. This letter serves as notice of Ms. Jackson's intent to seek redress for these violations.

Please direct all future correspondence regarding this matter to my office. If you have any questions or wish to discuss this matter further, do not hesitate to contact me directly.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dionne Webster-Cox".

Dionne E. Webster-Cox

Attorney

dewc@websterlawofficepllc.com

cc: Shaquithia L. Jackson

Jackson Federal Complaint

Final Audit Report

2025-04-21

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"Jackson Federal Complaint" History



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